



# California Regional Water Quality Control Board Lahontan Region



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Agency Secretary

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## PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT VEGETATION TREATMENTS USING HERBICIDES ON BUREAU OF LAND MANAGEMENT LANDS IN 17 WESTERN STATES

1 This letter transmits our comments regarding your preparation of a programmatic environmental impact statement (PEIS) for the proposed vegetation treatments using herbicides on Bureau of Land Management lands in 17 western states. Our agency is mandated with protecting water quality within the Lahontan Region of eastern California and our comments are related to any proposed herbicide applications within this area.

2 The final PEIS will guide the BLM's actions through its proposed treatment of vegetation on approximately 932,000 acres annually in 17 western states in the United States, including Alaska, using 14 currently approved and four new herbicide active ingredients.

3 Our comments regarding this draft PEIS proposal are as follows:

1. **Water Quality Standards.** The *Water Quality Control Plan for the North Lahontan Basin* (Basin Plan) contains the following objectives regarding pesticides:

"Pesticide concentrations, individually or collectively, shall not exceed the lowest detectable levels, using the most recent detection procedures available. There shall not be an increase in pesticide concentrations found in bottom sediments. There shall be no detectable increase in bioaccumulation of pesticides in aquatic life.

Waters designated as MUN (i.e. for use as domestic or municipal supply) shall not contain concentrations of pesticides in excess of the limiting concentrations specified in Table 64444-A of Section 64444 (Organic Chemicals) of Title 22 of the California Code of Regulations which is incorporated by reference into this plan. This incorporation-by-reference is prospective including future changes to the incorporated provisions as the changes take effect."

4 These objectives require that no levels of herbicides be detectable in waters (including wetlands) of the Lahontan Region at any time. Your EIS should: (1) clearly acknowledge these requirements, (2) provide for adequate mitigation measures to assure compliance with these objectives, and (3) provide for adequate monitoring and reporting to assess compliance with these objectives.

5 2. **Mitigation measures.** Your EIS should include detailed descriptions of all project-wide and site-specific temporary and permanent Best Management Practices (BMPs) or other measures to be utilized/installed. This is necessary for us to evaluate the effectiveness of proposed BMPs or other measures in mitigating the potential water quality impacts that may result from project implementation. Of particular concern are measures proposed to mitigate the potential water quality impacts of aerial pesticide applications, and ground applications in proximity to surface waters (including wetlands).

6 3. **Monitoring.** All alternatives that include pesticide applications should contain a detailed monitoring plan to verify that the above Basin Plan pesticide objectives are not violated. Your EIS should display clearly what type of monitoring is planned, including a detailed schedule for monitoring to be conducted.

7 4. **Reporting.** Your EIS should specify that this office requires ample notification of specific weed control projects which utilize pesticides within the Lahontan Region. Such notification is necessary for us to be able to assess compliance with State water quality standards. Your EIS should also specify that this office will receive copies of monitoring results related to water quality within the Lahontan Region.

8 Thank you in advance for incorporating our comments into your environmental document. Please send me a copy of the final Programmatic Environmental Impact Statement (PEIS) when it is available for review.

Please call Douglas Cushman at (530) 542-5417 if you have any questions regarding this letter.



for Lauri Kemper  
Division Manager

DMC/didT:/BLM PEIS Herbicides  
[To be filed: Gen: BLM]